

# WILLKIE FARR & GALLAGHER LLP

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October 30, 2007

## **VIA ELECTRONIC FILING**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: **Ex Parte Presentation; Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers (WT Dkt. No. 05-265)**

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Dear Ms. Dortch:

On October 29, 2007, David Don, on behalf of SpectrumCo LLC, and I met with Fred Campbell, Nese Guendelsberger, Blaise Scinto, and Brent Greenfield of the Wireless Telecommunications Bureau to discuss issues raised by the above- referenced proceeding.

Mr. Don discussed the Petition for Reconsideration filed by SpectrumCo, and the potential problems for new entrants raised by the Commission's decision to adopt a "home roaming" exception to the automatic roaming right. Mr. Don pointed out that the experience of the major wireless carriers shows that it will take years for a significant new entrant to construct a national network, but that customers of a new network will expect their terminal devices to work wherever they take them. As a result, a rule limiting the right to automatic roaming to unlicensed territories will increase barriers to entry and diminish subscribers' utility.

Respectfully submitted,

*/s/ Philip L. Verveer*  
Philip L. Verveer  
Counsel to SpectrumCo LLC

cc: Mr. Fred Campbell  
Ms. Nese Guendelsberger  
Ms. Blaise Scinto  
Mr. Brent Greenfield